

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDRES A. PEREZ, an individual,)
ALFREDO TREJO, an individual, and) Case No. 21-cv-00013
JOSE J. NAJERA, an individual,)
)
Plaintiffs,)
)
v.) Honorable Manish S. Shah
)
)
ELITE VALET SYSTEMS, INC., a dissolved)
Illinois corporation, and JOSEPH SEVERINO, an)
individual,) Magistrate Judge Young B. Kim
)
Defendants.)

**AFFIDAVIT OF ATTORNEY TIMOTHY M. NOLAN
IN SUPPORT OF PLAINTIFFS' MOTION FOR
THE AWARD OF ATTORNEY'S FEES**

[illegible]

TIMOTHY M. NOLAN, being first duly sworn on oath, deposes and states as follows:

1. I have personal knowledge of the facts set forth in this Affidavit and if called upon to testify, could competently testify to the facts set forth herein.

2. I am the owner and supervising attorney of the Nolan Law Office, attorneys for the Plaintiffs in the above-captioned matter.

3. This Affidavit sets forth the services performed and the attorney's fees incurred on behalf of the Plaintiffs during the course of this litigation from December 17, 2020 through June 23, 2021.

4. The Nolan Law Office performed a substantial volume and variety of legal services on behalf of Plaintiffs during the six-month period from December 17, 2020 through June 23, 2021 including: investigation; legal research; drafting pleadings; analysis of hours

worked records and Defendants' method of wage payments to Plaintiffs; analysis of wage payment data and records; and motion practice including a motion for entry of an order of default and motion for default judgment including detailed damages calculations and supporting declarations.

5. The Nolan Law Office concentrates its legal practice on employment, wage and hour, and civil litigation matters, and during the relevant time period, the Nolan Law Office was comprised of attorney, Timothy M. Nolan. The Nolan Law Office has represented the Plaintiffs throughout the course of the captioned litigation which involves claims for unpaid overtime and other wages under the FLSA, IMWL and IWPCA.

6. I earned my undergraduate degree from the University of Chicago in 1983 and my Juris Doctor from Northwestern University School of Law in 1986. I was admitted to the Illinois State Bar and the United States District Court for the Northern District of Illinois in 1986; the Trial Bar for the Northern District of Illinois in 1988; and, the United States Court of Appeals for the Seventh Circuit in 1993. Prior to forming the Nolan Law Office in 1994, I was employed as a litigation associate with the law firms of Hinshaw and Culbertson, and Bell, Boyd and Lloyd in Chicago, Illinois.

7. As of 2019, the Nolan Law Office charges the rate of \$450.00 per hour for legal services rendered by attorney Timothy M. Nolan and courts in this District have awarded the Nolan Law Office the rate of \$450.00 for attorney Nolan in other FLSA matters. See, Zavala v. Darbar Management, Inc., et al., Case No. 19-cv-04041, Dkt. 126 at p. 2-3 and Dkt. 127 (N.D. Ill.) (Fuentes, Mag. J. and Seeger, J.); Perez v. Albany Restaurant, Inc., et al. Case No. 1:19-cv-04668, Dkt. 36, 38, 58-59 (N.D. Ill.) (Pallmeyer, C.J.); and, Ramirez, et al. v. The Tequilla Corporation, et al., Case No. 19-cv-05654, Dkt. No. 44 and 47 at p. 9-10 (N.D. Ill.) (Kness, J.).

8. Attached hereto as Exhibit A-1 is a true and correct copy of the Statement for Professional Services issued by the Nolan Law Office in connection with the representation of Plaintiffs from December 17, 2020 through June 23, 2021. The attached Statement for Professional Services and the information contained therein is based on the standard and regular practices of the Nolan Law Office concerning the recording of time of services rendered.

9. Attorneys at the Nolan Law Office record time devoted to various legal tasks in time slip records which are prepared on a daily basis. Time is recorded in tenths of an hour. I personally maintain the daily time slip records in the ordinary course of business and in connection with my supervision of the Nolan Law Office. I also personally prepare all Statements for Professional Services based on the time slip records.

10. I performed all of the legal tasks described in the attached Statement for Professional Services.

11. Between December 17, 2020 and June 23, 2021, and excluding hours for which compensation is not sought, Plaintiffs incurred attorneys' fees totaling \$26,550.00 in connection with this litigation including the following:

Timothy M. Nolan	59.0 hours	\$26,550.00
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Timothy M. Nolan

Subscribed to and sworn before me
this 8th day of September, 2021


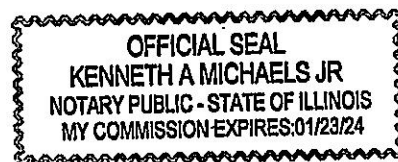

Notary Public

EXHIBIT A-1

STATEMENT FOR PROFESSIONAL SERVICES**June 23, 2021**

Tax I.D. 36-3982053

Please make payment to:

Nolan Law Office
 53 West Jackson Blvd.
 Suite 1137
 Chicago, IL 60604

Re: Andres A. Perez, et al. v. Elite Valet Systems, Inc., et al.
 Case No. 1:21-cv-00013 (N. D. Ill.)

New charges to date	\$ 26,550.00
Total charges now due	\$ 26,550.00

Services Rendered

12/17/20	Prepare for and confer with clients re employment history, wages and defendant's method of wage payments and wage and hour claims;	2.3
12/21/20	Prepare for and participate in further conference with A. Trejo re hours worked and records of hours worked;	0.6
12/21/20	Continue evaluating clients' records re hours worked and wage payments; formulate complaint allegations;	1.3
12/22/20	Investigate corporate status of related Valet and customer entities; continue formulating pleading allegations;	0.8
12/22/20	Draft correspondence to investigator K. Read re search on J. Severino;	0.2
12/22/20	Continue analysis of A. Trejo weekly hours worked records; prepare damages spreadsheet formula;	1.4
12/28/20	Continue analysis of plaintiffs' hours worked and wage payment information; commence drafting complaint;	2.7
12/29/20	Continue drafting complaint;	2.7 4.7

12/30/20	Confer with A. Perez re time worked records and hours worked at banquet facility; commence analysis of A. Perez work hours;	0.6
12/30/20	Edit and revise complaint;	1.3
01/02/21	Continue editing and revising complaint;	1.5
01/04/21	Continue analysis of A. Perez time worked records;	1.2
01/04/21	Complete preparation of complaint; prepare civil cover sheet and attorney appearance; file same with District Court;	1.6
01/05/21	Prepare for and conference with J. Najera re time worked records, wage payments, and primary duties as valet attendant; commence analysis of J. Najera records of hours worked;	1.4
01/05/21	Receive and review District Court order re initial status report;	0.1
01/06/21	Draft correspondence to investigator K. Read re instruction for service of summons on the individual defendant;	0.4
01/08/21	Confer with A. Perez re additional wage payment and hours worked records including hours of work at defendants' banquet facility; update A. Perez damages spreadsheet;	1.7
01/12/21	Continue analysis of A. Perez hours worked records;	2.0
01/19/21	Prepare for and conference with J. Najera re additional hours worked records; commence review of the same;	0.7
01/20/21	Continue review and analysis of J. Najera hours worked records;	0.6
01/20/21	Extended teleconference with attorney B. Leslie re pre-suit letter to acquire business and file materials re same; receive and commence review of Seannell firm file materials;	1.5
01/29/21	Teleconference with J. Najera re text message received from J. Severino and instructions re same;	0.2
01/29/21	Exchange correspondence with investigator K. Read re service of summons and complaint and re anticipated service affidavit;	0.2
01/29/21	Teleconference with A. Perez re Severino text message and instructions re same;	0.1

02/04/21	Receive and review investigator K. Read correspondence and return of service affidavit re service on individual defendant;	0.2
02/05/21	File return of service affidavit re service on individual defendant J. Severino;	0.1
02/08/21	Teleconference with defendant J. Severino re summons, complaint and direction to have attorney contact;	0.1
02/09/21	Receive and review further correspondence from investigator K. Read re service of summons and complaint on the individual defendant;	0.1
02/11/21	Continue analysis of A. Trejo hours worked records and records of defendant Severino threats;	0.7
02/11/21	Continue examination of Scannell Law Firm file materials;	1.0
02/12/21	Complete analysis of Scannell Law Firm file materials;	0.3
02/24/21	Review text messages from defendant Severino produced by J. Najera;	0.3
02/24/21	Edit and revise A. Perez damages spreadsheet to reflect hours worked at banquet facility;	0.7
02/24/21	Edit and revise A. Trejo damages spreadsheet;	0.5
02/24/21	Teleconferences with J. Najera re time worked and wage payment records; continue analysis of J. Najera hours worked summaries;	1.6
03/01/21	Draft correspondence to investigator K. Read re instructions for service on corporation defendant;	0.4
03/02/21	Commence drafting status report;	1.0
03/03/21	Complete preparation of draft initial status report; draft correspondence to individual defendant re same;	0.7
03/08/21	Teleconference with individual defendant J. Severino;	0.2
03/08/21	Edit and status and revise draft report; file same with District Court;	0.2
03/09/21	Receive and review District Court order re further status report;	0.1
03/11/21	Teleconference with J. Najera and A. Trejo re rejection of defendants' settlement offer and demand authorization;	0.4

03/11/21	Teleconference with A. Perez re rejection of settlement offer and demand authorization;	0.2	
03/12/21	Teleconference with investigator K. Read re service of summons and complaint on corporate defendant;	0.2	
03/12/21	Further teleconference with J. Najera re settlement demand authority;	0.3	
03/15/21	Draft correspondence to defendant rejecting offer and issuing plaintiffs' settlement demand; serve same;	0.8	
03/16/21	Receive and review process server affidavit re service on Elite Valet; file same with District Court;	0.2	
04/02/21	Draft plaintiffs' motion for entry of order of defendant; file same with District Court; place for service on defendants;	0.8	
04/05/21	Receive and review District Court order granting plaintiffs' motion for entry of order of default;	0.1	
04/05/21	Teleconference with defendant J. Severino re no appearance or answer;	0.1	
04/19/21	Teleconference with all clients re entry of order of default and re anticipated motion for default judgement;	0.4	
04/26/21	Commence drafting plaintiffs' motion for default judgment including argument re damages calculations;	3.2	
04/27/21	Receive and commence analysis of J. Najera supplemental time worked records; evaluate all plaintiffs' pay periods ending and individual hours worked calculations; edit and revise damages spreadsheets;	2.1	4.2
04/29/21	Continue analysis of J. Najera supplemental production of time records;	1.0	
05/05/21	Edit, revise and proof damages spreadsheets for A. Perez and A. Trejo;	1.2	2.4
05/06/21	Continue editing and revising J. Najera damages calculation per fluctuating work week method;	1.0	
05/07/21	Continue editing and revising overtime damages calculations and base wage damage calculations for all plaintiffs; quality check all damages spreadsheets;	1.9	3.9
05/10/21	Edit and revise A. Trejo damages spreadsheets and J. Najera spreadsheets;	1.3	2.6

05/11/21	Continue editing J. Najera damages spreadsheets;	1.2 2.5
05/12/21	Teleconference with A. Perez re revisions to damages spreadsheet re term of \$10 per hour wage rate;	0.2
05/17/21	Final quality control check on all damages spreadsheets;	1.0
05/18/21	Prepare plaintiffs' declarations in support of motion for default judgment;	2.5
05/18/21	Commence drafting attorney TMN declaration in support of motion for default judgment;	2.2
05/19/21	Continue drafting attorney TMN declaration in support of motion for default judgement;	1.1 2.2
05/19/21	Conference with J. Najera re declaration in support of motion for default judgement;	0.4
05/19/21	Conference with A. Trejo re declaration in support of motion for default judgement;	0.4
05/19/21	Continue drafting motion for default judgement;	2.0 4.0
05/20/21	Continue drafting motion for default judgement;	1.1
05/20/21	Draft proposed order of judgement;	0.3
05/21/21	Confer with A. Perez re declaration in support of motion for entry of default judgement;	0.3
05/21/21	Continue preparation of plaintiffs' motion for entry of default and supporting exhibits;	0.7
05/21/21	File plaintiffs' motion for entry of default judgement and place same for service on defendants;	0.4
05/24/21	Receive and review District Court order re due date for response to motion for default judgment;	0.1
05/25/21	Draft correspondence to defendants re Court order Dkt 12; place same for service on defendants via FedEx;	0.3
05/25/21	Draft certificate of service re service of Court order Dkt. 12; file same with District Court;	0.2

05/25/21	Teleconference with J. Severino re purported May 20, 2021 filing and threatened state court suits against plaintiffs;	0.2
05/26/21	Receive and review defendants' motion to vacate; draft response to the same; file same with District Court;	0.6
06/14/21	Receive and review District Court order denying defendants' motion to vacate and granting plaintiffs' motion for default judgment and entry of judgment in a civil case;	0.2
06/14/21	Teleconferences with clients re entry of judgment and supplemental proceedings;	0.5
06/15/21	Receive email from defendant J. Severino re anticipated appeal; teleconference with defendant Severino re same;	0.1
06/22/21	Prepare bill of costs, itemization of costs, and supporting records; file same with District Court; place same for service on defendants;	1.0
06/22/21	Teleconference with defendant J. Severino re plaintiffs' bill of costs and defendants' appeal and threatened state courts suits against plaintiffs;	0.2
06/22/21	Commence drafting statement for professional services in support of fee petition;	0.9
06/23/21	Complete preparation of statement for professional services in support of fee petition;	0.6
06/23/21	Receive and review District Court order granting bill of costs.	0.1

TOTAL FEES FOR THIS MATTER	82.3 hrs. (TMN)	\$ 37,035.00
	59.0 hrs.	\$ 26,550.00

TOTAL CHARGES NOW DUE	\$ 37,035.00
	\$ 26,550.00